

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

LEON BLACK,

Defendant.

Case No. 1:23-cv-06418-JGLC

DECLARATION OF SUSAN ESTRICH

I, Susan Estrich, do hereby declare under penalty of perjury that the following is true and correct:

1. I am the founding partner of the law firm of Estrich Goldin LLP, attorneys for Defendant, and I am admitted *pro hac vice* in this case. I submit this declaration in support of Defendant Leon Black's Memorandum of Law in Support of his Motion to Stay Discovery. I am fully familiar with all matters set forth in this Declaration based on personal knowledge about the facts and matters below.

2. Plaintiff noticed depositions for Defendant and non-party Melanie Spinella, on November 14 and 28 respectively.

3. On October 26, 2023, I met and conferred telephonically with Jeanne Christensen and Meredith Firetog, counsel for Plaintiff, for approximately 15 minutes regarding discovery issues and Defendant's request to stay discovery pending the resolution of his Motion to Dismiss. The parties are at impasse and respectfully request resolution of this dispute by the Court.

4. After the filing of Ms. Doe’s complaint on July 25, 2023, Defendant hired professional, seasoned investigators to conduct a review into Plaintiff’s allegations. This investigation revealed certain of Plaintiff’s posts and communications on social media.

5. Plaintiff deleted her Twitter account a few months prior to filing this action but some of Plaintiff’s tweets are available using public Internet Archives.

6. Defendant is in possession of direct messages between Plaintiff and third parties who have asked to remain anonymous, we suspect for fear of retaliation.

I. Contradictory Evidence to Filings

7. In a [REDACTED] Twitter post, Ms. Doe tweeted: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] A true and correct copy of this public tweet is attached as Exhibit 1.

8. This praise and these fond memories are consistent with the information that “Elizabeth” provided Defendant’s investigators during her interview.

9. Contradictory evidence has also surfaced regarding the declaration Plaintiff’s counsel submitted in support of the motion to proceed anonymously. ECF Doc. No. 7. This declaration tells the tale of a “large white Suburban: that parked outside Ms. Doe’s residence” and remained “just feet from the family’s driveway,” including a picture of the vehicle. *Id.* ¶¶5-6 & Ex. 1. In Plaintiff’s memorandum in support of the motion, Ms. Christensen explained that one example of the ways that Defendant was “harass[ing] and intimidate[ing]” the Plaintiff was by parking this “large white Suburban . . . just inches from the family’s driveway.” ECF Doc. No. 8 at 1.

10. Defendant's investigators have discovered that the vehicle in question actually belongs to Plaintiff's neighbors, a young married couple that bought the vehicle a few weeks before Ms. Christensen filed the motion and her declaration. The couple lives [REDACTED] doors down and across the street from Plaintiff.

II. Claims of Various Medical Conditions

11. Ms. Doe has claimed that she suffers from various medical conditions, many of which are quite serious and extremely rare. In addition to the Mosaic Down Syndrome and autism alleged in the Complaint, Ms. Doe has claimed in public tweets or other correspondence to have suffered from:

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

12. Although we currently do not have access to Plaintiff's medical records, it is notable that Plaintiff seems to come up with claims of serious medical conditions immediately after another individual tells a similar tale and is given positive attention as a result.

13. Plaintiff's family was unaware of any of these conditions; and they said her claims to have autism and Mosaic Down Syndrome—and displaying characteristic behavioral

symptoms for the first time—followed third parties receiving sympathy, support, and attentions when discussing those conditions.

14. Plaintiff's [REDACTED] stated that Plaintiff only began displaying such behaviors in her twenties, and did so intentionally in order to present herself as a person with autism.

III. Claims of [REDACTED] Heritage

15. Ms. Doe has at various times asserted contradictory or plainly false claims regarding her origin story, specifically that:

- [REDACTED]
[REDACTED]
- [REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]

16. On [REDACTED], Ms. Doe tweeted that [REDACTED]
[REDACTED]

[REDACTED] A true and correct copy of this public tweet is attached as Exhibit 3.

17. [REDACTED] days later, on [REDACTED], Ms. Doe tweeted, “As a [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] A true and correct copy of this public tweet is attached as Exhibit 4.

18. When another person posted on Twitter that [REDACTED]

[REDACTED] Ms. Doe responded that she was [REDACTED]

[REDACTED] By her own admission, [REDACTED]

[REDACTED] A true and correct copy of this public tweet is attached as Exhibit 5.

19. She repeated versions of this claim multiple times over the next [REDACTED] days:

- On [REDACTED] she tweeted, [REDACTED]
[REDACTED]
- On [REDACTED] she tweeted [REDACTED]
[REDACTED] [REDACTED] A true and correct copy of this public tweet is attached as Exhibit 7;
- On [REDACTED] she responded to another Twitter user by stating that she missed [REDACTED]
[REDACTED]
[REDACTED] A true and correct copy of this public tweet is attached as Exhibit 8.

20. In a thread in which she claimed to have received [REDACTED] messages on social media, she tweeted on [REDACTED] that she [REDACTED]
[REDACTED] A true and correct copy of this public tweet is attached as Exhibit 9.

21. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

22. [REDACTED]

[REDACTED]

IV. Repeated Public Disclosures of Ms. Doe's Alleged Abuse from Epstein

23. Based on my review of Ms. Doe's Twitter posts, Twitter Spaces conversations, and correspondence on social media, in the last 16 months, Ms. Doe has repeatedly publicly identified herself as an Epstein survivor, explained that she was trafficked by Epstein for two years as a child, used the hashtags "#Epstein" and "#JeffreyEpstein," and connected with various Twitter users with larger followings who relayed her tweets detailing her alleged abuse to their followings.

24. [REDACTED]

[REDACTED]

[REDACTED]

25. It appears that Ms. Doe deleted her account in or around [REDACTED]. However, many of her Twitter interactions can be found on the publicly available Internet Archive (<https://web.archive.org/>).

26. On [REDACTED], Ms. Doe tweeted, "[REDACTED]"

[REDACTED]

[REDACTED] A true and correct copy of this public tweet is attached as Exhibit 11.

27. On [REDACTED] she posted that she [REDACTED]

[REDACTED].” A true and correct copy of this public tweet is attached as Exhibit 12.

28. On [REDACTED] while [REDACTED]
[REDACTED], Ms. Doe tweeted that [REDACTED]
[REDACTED]
[REDACTED].” A true and correct copy of this public
tweet is attached as Exhibit 13.

29. On [REDACTED] Ms. Doe tweeted that [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] A true and correct copy
of this public tweet is attached as Exhibit 14.

30. In addition, on 51 occasions (that we currently know about), Plaintiff spoke during live online meetings on Twitter called “Twitter Spaces” containing as many as 6,300 viewers. True and correct copies of screenshots of Plaintiff’s Twitter account illustrating these spaces are attached as Exhibits 10, 15, 16.

31. Twitter users who attended some of those spaces have told Defendant’s investigators that Plaintiff often spoke about her trafficking and abuse during these events.

32. In her conversations with fellow Twitter users, Ms. Doe has claimed to have been on Epstein’s flight logs and made references to two of his pilots, Mr. Larry and Mr. Gary, and how they were well acquainted with her.

33. On information and belief, Plaintiff’s name does not appear on flight logs for Epstein’s planes and helicopters.

34. On information and belief, Plaintiff has not submitted any claim with the Epstein estate.

35. Ms. Doe has also claimed in conversations with fellow Twitter users that [REDACTED]. Ms. Doe has further claimed in conversations with fellow Twitter users that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

I affirm under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 8, 2023

/s/ Susan Estrich
Susan Estrich